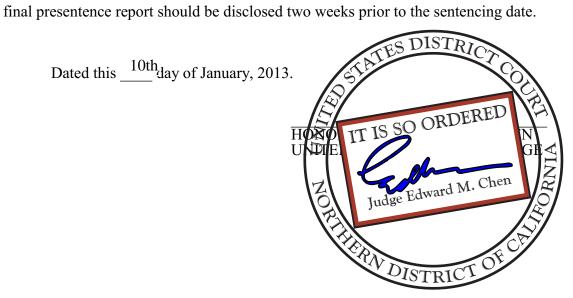
1 2 3 4 5 6 7 8	MELINDA HAAG (CABN 132612) United States Attorney MIRANDA KANE (CABN 150630) Chief, Criminal Division KYLE F. WALDINGER (ILBN 6238304) Assistant United States Attorney 450 Golden Gate Avenue, 11 th Floor San Francisco, California 94102 Telephone: (415) 436-6830 Facsimile: (415) 436-7234 E-mail: kyle.waldinger@usdoj.gov Attorneys for Plaintiff	
10	UNITED STATES DISTRICT COURT	
11	NORTHERN DISTRICT OF CALIFORNIA	
12	SAN FRANCISCO DIVISION	
13	UNITED STATES OF AMERICA,	No. CR 07-0337 EMC
14	Plaintiff,	PARTIES' JOINT REQUEST TO CONTINUE STATUS HEARING AND [PROPOSED] ORDER
15	v.)	
16	JACQUELINE FROEHLICH- L'HEUREAUX,	
17	Defendant.	
18)	
19	It is hereby stipulated by and between counsel for the United States, Assistant U.S.	
20	Attorney Kyle F. Waldinger, and counsel for defendant Jacqueline Froehlich-L'Heureaux, Leland	
21	B. Altschuler, that, subject to the Court's approval, the status hearing presently set for January	
22	23, 2013 be continued and set for a sentencing hearing on June 26, 2013 at 2:30 p.m. The United	
23	States has learned from the Court's publicly posted availability information that the Court is	
24	available on that date.	
25	The defendant Jacqueline Froehlich-L'Heureaux pled guilty pursuant to a plea agreement	
26	on June 4, 2007, to one count of conspiracy to gain unauthorized access to a protected computer,	
27	exceed authorized access to a protected computer, and traffic in a password allowing	
28	unauthorized access to a protected computer, in violation of 18 U.S.C. § 371. The case was	
	JOINT REQ. & [PROPOSED] ORDER CR 07-0337 EMC	

1 referred to the Probation Office for a presentence report. The plea agreement also includes 2 standard terms of cooperation. 3 In light of continuing cooperation under the terms of the plea agreement, the parties 4 jointly request that the status hearing on January 23, 2013 be continued for a sentencing hearing 5 on June 26, 2013 at 2:30 p.m. Additional time is needed for the defendant to complete her 6 cooperation with the government, and, accordingly, this matter is not yet ready to proceed to 7 sentencing. Specifically, charges have been filed against an alleged co-conspirator of the 8 defendant, David Nosal. The Nosal case is numbered CR 08-0237 EMC. This Court has set a 9 trial date of April 8, 2013 for the Nosal case. The defendant Froehlich-L'Heureaux is expected 10 11 cooperation with the government's investigation is not yet complete. 12 13 14 using the new sentencing date. 15 16 SO STIPULATED. 17 Dated: January 2, 2013 MELINDA HAAG 18 19 20 21 SO STIPULATED. 22 23 Dated: January 2, 2013 24 25 26 [PROPOSED] ORDER 27 GOOD CAUSE APPEARING, 28

to testify in that trial. Because Ms. Froehlich-L'Heureaux will be required to testify at trial, her For all of these reasons, the parties jointly request that this Court vacate the status hearing presently set for January 23, 2013 and set a sentencing hearing for June 26, 2013 at 2:30 p.m. In addition, the parties jointly request that the due dates for the presentence report be calculated United States Attorney Assistant United States Attorney LELAND B. ALTSCHULER Attorney for defendant Froehlich-L'Heureaux IT IS ORDERED that the status hearing presently set for January 23, 2013 is vacated. JOINT REQ. & [PROPOSED] ORDER CR 07-0337 EMC -2The parties are ordered to appear for a sentencing hearing on June 26, 2013 at 2:30 p.m. The



JOINT REQ. & [PROPOSED] ORDER CR 07-0337 EMC

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